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Date: 4/7/97 11:55am
Subject: CEQ EJ Guidance under NEPA

Comments on CEQ guidance:

1. The inclusion of "tribal lands" is not consistent throughout document. In some instances "tribal lands" has been inserted when it follows "minority communities and low-income communities" as in Section III. B. number 2, but even later on in that same paragraph it is not included. For example in the scoping section "tribal lands" is included, but in "Determining the environment" section, sentence 1, it is not. Make sure inclusion of "tribal lands" is consistent.

2. Section III. B. 2) First sentence should read is soemwhat confusing, suggest changing to:

"Relevant and reasonably available public health data; industry data; potential for multiple, synergistic, or cumulative exposure to human health or environmental hazards in the affected population; and historical patterns of exposure to risk and environmental hazards."

3. Section III. B. 4)

"Public participation strategies... should 'implement meaningful education, awareness and outreach activities for' affected groups."

4. Section III. B. 5)

"... Agencies should 'aim' to have complete..."

5. 1. Scoping B. Ensuring Effective Communication

Second paragraph: "... the public should have access to 'relevant and accurate' information..."

6. Footnote 26: perhaps you could include information on how agencies can obtain "Landview II" software.

Thank you for the opportunity to comment on the draft guidance. Overall, I believe the guidance is well written, but am curious as to how helpful the guidance is from an agency standpoint. Do agencies find it useful? Is there additional costs to agencies because more time and research is needed to comply with NEPA?

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